

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: John Conroy
Title: Vice President

REQUEST: Department of Telecommunications & Energy, Set #2

DATED: January 16, 2004

ITEM: DTE 2-1 Please refer to the Initial Testimony of Verizon Massachusetts, p. 12, at lines 9-11. Please explain the reference to “the admonition of the FCC.”

REPLY: “[T]he admonition of the FCC” referenced at page 12, lines 9-11 of the Initial Panel Testimony of Verizon Massachusetts refers to paragraph 495 of the *Triennial Review Order*, where the FCC advises that: “states should not define the market so narrowly that a competitor serving that market alone would not be able to take advantage of available scale and scope economies from serving a wider market.”

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Docket No. 03-60

Respondent: Ross Riddles

Title: Manager-Financial Planning &
Analysis

REQUEST: Department of Telecommunications & Energy, Set #2

DATED: January 16, 2004

ITEM: DTE 2-2 Please refer to the Supplemental Panel Testimony of Verizon Massachusetts, Attachment 1, Parts 1 and 2.

- a. Please break down the “Verizon Count” further into “Line Count Study” and “Residential Listing in the E911 Database,” depending on the source of the data.
- b. Are all the lines listed under “Residential Listing in the E911 Database” served using intermodal switching alternatives? If no, please describe and identify exceptions.

REPLY:

- a. Please see Confidential Attachment DTE 2-2. The attachment contains proprietary information and is being provided to the Department and to parties in accordance with the terms of the Department’s Protective Order.
- b. All of the lines included for Residential Listings in the E911 database are served by cable companies using their own switches. They are not necessarily using “intermodal switching alternatives,” since cable telephony providers may use traditional circuit switches, or they may use packet or soft switches. As Verizon noted in its Initial Panel Testimony, both RCN and Comcast have deployed circuit switches that are physically located in Massachusetts.

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Docket No. 03-60

Respondent: Richard Reich
Title: Manager

REQUEST: Department of Telecommunications & Energy, Set #2

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ITEM: DTE 2-3 Refer to Hot Cut Panel Testimony, p. 56, lines 3-10. Please fully explain what information is contained within the Work Force Administration-Dispatch In ("WFA-DI") system and how the data is entered into it.

REPLY: The WFA/DI system and center administrators define work centers for the system by entering data in a series of system tables. These tables include provisioning, reference, configuration and routing, and center options data. The WFA/DI system can receive installation-type service orders from four sources:

- TIRKS system (via Circuit Documents for Operations Craft (CDOC))
- WFA/Control system
- manual input using WFA/DI Order Entry (DIOE)
- FOMS/FUSA system.

WFA/DI receives trouble reports as "handoffs" from the WFA/Control system. It is also possible to manually enter trouble reports into WFA/DI. WFA/DI matches the incoming work to qualified technicians. The system then estimates how long it should take to complete the work and assigns ("loads") the work requests to individual technicians. The system creates a list of work items known as the Trouble Ticket Work List (DITTWL). Central office technicians use the system's on-line work requests, circuit documents and frame output to analyze and complete necessary work on the service order or trouble report. They also use on-line screens to post completions and jeopardies back to TIRKS via WFA/Control and FOMS.

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Respondent: Bruce F. Meacham
Title: Group Manager – Service Costs

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ITEM: DTE 2-4 Refer to Hot Cut Panel Testimony, p. 56, lines 7-8. Please explain how Verizon determined the travel times as a proportion of total central of total central office technician time.

REPLY: The percentages were taken from WFA-DI data that identified travel time as a percentage of total central office time.

Please see Verizon MA's reply to AT&T Information Request 3-161.

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Respondent: Bruce F. Meacham
Title: Group Manager – Service Costs

REQUEST: Department of Telecommunications & Energy, Set #2

DATED: January 16, 2004

ITEM: DTE 2-5 Refer to Hot Cut Panel Testimony, p. 56, lines 16-17. For each average task time derived from the survey process, please provide the corresponding average time produced from the WFA-DI system.

REPLY: As described in Verizon MA's Initial Panel Testimony, p. 56, lines 13 – 14, "WFA-DI data is too aggregated to provide data sufficiently detailed to enable the necessary cost studies." In other words, WFA-DI cannot provide average times for each of the work activities identified in Exhibit III-A-P, Tabs 1 – 10, Column B. Verizon MA instead used the survey process to derive the average work times for each work activity so that Typical Occurrence Factors and Forward-Looking Adjustment Factors could be applied to develop weighted, forward-looking total costs for the CO Frame work on the various types of hot cuts; Basic, Large Job and Batch.

However, Verizon found the total survey time results are consistent with the total average time identified through the WFA-DI system for the CO Frame work identified in the scalability model. For details, please see Verizon MA's reply to Attorney General Information Request 2-10.

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Docket No. 03-60

Respondent: Kevin Vaninwegen
Title: Manager

REQUEST: Department of Telecommunications & Energy, Set #2

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ITEM: DTE 2-6 Refer to Hot Cut Panel Testimony, p. 35, lines 18-19 (“The process would not apply to IDLC lines and to certain other loop types”). Please identify the “other loop types” that Verizon is referring to and explain why they cannot be included in the batch process. In addition, if these other loop types are excluded from the large job process, please explain why.

REPLY: The following loops have been excluded from the initial Batch Hot Cut process:

- IDLC circuits due to high level of coordination required
- Digital accounts: ISDN, xDSL, SWXX, etc.
- EEL or M-Loop type migrations
- CSS (Customer Specified Signaling) loops
- RSU (Remote Switch Units; where service is provisioned via Verizon owned Remote Switch, shares NPA/NNX with Host)
- Foreign Exchange Lines
- Loop to Loop migrations (port will drop this out)
CLEC to CLEC

These types of loops were excluded for two reasons:

- (1) the batch process was conceived as a process for mass-market-type customers; and
- (2) to simplify the initial phases of the Batch Hot Cut process.

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ITEM: DTE 2-7 Refer to ATT-VZ 2-74 and 2-75. Please fully explain why a CLEC cannot have a loop on IDLC cutover to a loop on UDLC and still be included within the batch or large job process. Are there any situations when an IDLC loop can be included in either of these processes, and if so, please fully explain under what conditions.

REPLY: There is no process that exists today to migrate a line from IDLC to UDLC in anticipation of a CLEC ordering UNE-L service.

Migrating customers served on IDLC is a time consuming process because each line requires coordination between the central office technician, the field technician, the RCCC and the CLEC. The only way to handle the order with the attention necessary is via the basic hot cut process.

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Respondent: Bruce F. Meacham
Title: Group Manager – Service Costs

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ITEM: DTE 2-8 How did Verizon determine to whom to distribute its hot cut work activity surveys? What effort, if any, did Verizon make to ensure that its hot cut surveys were distributed to a sample representative of Verizon's actual work force?

REPLY: Verizon MA Service Cost Analysts went to managers of three of the same work centers involved in the basic hot cut processes approved in MA D.T.E. 01-20, namely, the NMC, RCCC and CO Frame. Please see the proprietary attachment to Verizon MA's reply to Conversent Information Request 6-22 that provides the survey instructions to the respondents. The managers were instructed to distribute the work activity survey forms to those reporting people who had direct experience responding to hot cut LSRs. The Service Cost Analysts accepted survey responses up to a cut-off date necessary to provide sufficient time to complete the study and meet the Department's filing schedule in D.T.E. 03-60.

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Respondent: Kevin Vaninwegen
Title: Manager

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ITEM: DTE 2-9 Please refer to Verizon Supplemental Panel Testimony, p. 10 (“Verizon has rolled out the WPTS process on a much larger scale”). At present, in which states does Verizon offer the WPTS process, and at what rates?

REPLY: WPTS is present across the Verizon footprint (CT, DC, DE, MA, MD, ME, NH, NJ, NY, NV, PA, RI, VA, VT, WV, CA, FL, HI, ID, IL, IN, MI, NC, OH, OR, SC, TX, WA, WI). The current rate in those states is the same as a non-WPTS hot cut.